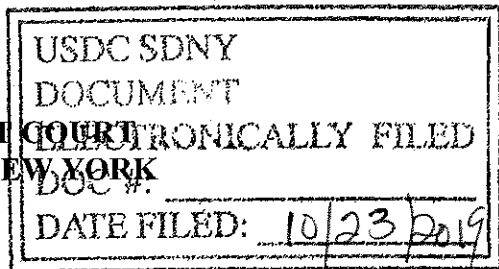


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



BUILDING TRADES PENSION FUND OF
WESTERN PENNSYLVANIA, Individually
and on Behalf of All Others Similarly Situated,

Plaintiff,

vs.

TEXTRON INC., SCOTT C. DONNELLY,
and FRANK T. CONNOR,

Defendants.

Case No. 1:19-cv-07881-DLC

ECF Case

STIPULATION AND
~~PROPOSED~~ ORDER

WHEREAS, Plaintiff Building Trades Pension Fund of Western Pennsylvania ("Plaintiff") filed a complaint (the "Complaint") in the above-captioned action (the "Action") against Defendants Textron Inc., Scott C. Donnelly, and Frank T. Connor (collectively, "Defendants") on August 22, 2019, alleging violations of the Securities Exchange Act of 1934 and Rule 10b-5 promulgated thereunder;

WHEREAS, the Action is subject to the Private Securities Litigation Reform Act, 15 U.S.C. § 78u-4 (the "PSLRA"), which provides, among other things, that (i) not later than 20 days after the date on which the first complaint in a private putative securities class action is filed, the plaintiff shall publish a notice advising members of the purported plaintiff class, (ii) not later than 60 days after the date on which the notice is published, any member of the purported class may move the Court to serve as lead plaintiff of the purported class, and (iii) not later than 90 days after the date on which the notice is published, the Court shall appoint the "most adequate plaintiff" as lead plaintiff for the putative class ("Lead Plaintiff");

WHEREAS, it is common in putative securities class actions under the PSLRA for the appointed Lead Plaintiff to file an amended complaint or to designate an existing complaint as operative; and

WHEREAS, Plaintiffs and Defendants (collectively, the "Parties") have met and conferred and, for the convenience of the Parties and the Court, hereby enter into the following stipulation regarding the schedule in this matter;

IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for the Parties, subject to the approval of the Court, that:

1. Each Defendant hereby accepts service of the Complaint, provided, however, that the acceptance of service and entry into this Stipulation shall not waive, and Defendants expressly preserve, any rights, claims or defenses other than a defense as to the sufficiency of service of the summons and Complaint.

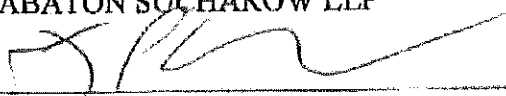
2. The time for any Defendant to answer, move or otherwise respond to the Complaint shall be extended ~~until a date to be agreed to by Lead Plaintiff and Defendants, and~~^{as} ordered by the Court, following the appointment of Lead Plaintiff pursuant to the PSLRA.

3. Within 10 days after the Court enters an order appointing Lead Plaintiff and Lead Plaintiff's counsel ("Lead Counsel"), counsel for Defendants and Lead Counsel shall confer and jointly submit to the Court a proposed schedule for the filing of an amended complaint or the designation of an operative complaint, and for the filing and briefing of any motion to dismiss by any Defendant. *alle*

Sa ordered,
Jessie Cole
10/22/19

Dated: October 21, 2019

LABATON SUCHAROW LLP

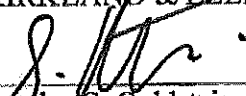


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Attorneys for Plaintiff

Dated: October ____, 2019

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Attorneys for Defendants

SO ORDERED.

Judge Denise L. Cote
United States District Judge